1 2 3 4 5 6 7 8 9	James K. Schultz, Esq. (SBN 309945) Kenneth A. Ohashi, Esq. (SBN 230440) Brittany L. Shaw, Esq. (SBN 331773) Sessions, Israel & Shartle, L.L.P. 1545 Hotel Circle South, Suite 150 San Diego, CA 92108-3426 Tel: 619/758-1891 Fax: 877/334-0661 ischultz@sessions.legal kohashi@sessions.legal bshaw@sessions.legal Attorneys for Defendant Unifin, Inc.				
10	UNITED STATES DISTRICT COURT				
11	NORTHERN DISTRICT OF CALIFORNIA				
12					
13	ANGELINA DONEZ, ) Case No: 4:21-cv-4751-KAW				
14	}				
15	Plaintiff,  AMENDED JOINT STIPULATION				
16	vs. ) TO EXTEND DEADLINES; ORDER (AS MODIFIED)				
17	IINIFIN INC and DOES 1.5				
18	[Local Rule 6-1(a)]				
19	Defendants.				
20	}				
21					
22	Plaintiff Angelina Donez ("Plaintiff") and Defendant Unifin, Inc.				
23	("Defendant") (collectively, the "Parties"), by and through undersigned counsel,				
24	hereby stipulate and agree as follows:				
25	WHEREAS, Defendant requires additional time to investigate the matter;				
26	and				
27					
	1				
	AMENDED JOINT STIPULATION TO EXTEND DEADLINES; ORDER (AS MODIFIED)				

WHEREAS, the Parties have commenced discussions to explore an informal resolution of this Action in good faith;

WHEREAS, the Parties agree that a brief extension of current deadlines will facilitate discussions for a possible early settlement of the matter; and

WHEREAS, this is the Parties' first request for an extension of any deadlines in this Action;

The Parties agree and stipulate to extend the following deadlines currently pending in this Action:

- 1. Defendant Unifin, Inc.'s time within which to respond to the Complaint is extended from 9/1/2021 to 9/15/2021.
- 2. The Parties' last day to meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan, is extended to 8/31/2021 to 9/14/2021.
- 3. The Parties' last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement per Standing Order re Contents of Joint Case Management Statement, is extended from 9/14/2021 to 9/28/2021.
- 4. The INITIAL CASE MANAGEMENT CONFERENCE (CMC) is continued from 9/21/2021, to a date at least two (2) weeks thereafter subject to the Court's calendar availability.

## IT IS SO STIPULATED.

## Case 4:21-cv-04751-KAW Document 12 Filed 09/10/21 Page 3 of 5

1	Dated: September	er 1, 2021	THE GRACE LAW GROUP, APC
2			/ / C 14 . C
3			/s/ Scott M. Grace Scott M. Grace
4			Attorney for Plaintiff
5			Angelina Donez
6			
7			SESSIONS, ISRAEL & SHARTLE, L.L.P.
8			/s/ James K. Schultz
9			James K. Schultz
10			Attorney for Defendant Unifin, Inc.
11			
12			
13			
14			
15			
16			
17 18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
			3

## **SIGNATURE ATTESTATION**

[*Local Rule 5-1(i)(3)*]

I hereby attest that I have obtained concurrence in the filing the content of this document from counsel for plaintiff, and have obtained his authorization to affix his electronic signature to this document.

/s/ James K. Schultz
James K. Schultz
Attorney for Defendant Unifin, Inc.

**ORDER (AS MODIFIED)** 1 Pursuant to the foregoing Stipulation, and for good cause shown, the Court 2 orders as follows: 3 4 1. Defendant Unifin, Inc.'s time within which to respond to the Complaint 5 is extended from 9/1/2021 to 9/15/2021. 6 7 2. The Parties' last day to meet and confer re: initial disclosures, early 8 settlement, ADR process selection, and discovery plan, is extended to 9 10 8/31/2021 to 9/14/2021. 11 3. The Parties' last day to file Rule 26(f) Report, complete initial 12 disclosures or state objection in Rule 26(f) Report and file Case 13 Management Statement per Standing Order re Contents of Joint Case 14 Management Statement, is extended from 9/14/2021 to 10/19/2021. 15 16 4. The INITIAL CASE MANAGEMENT CONFERENCE (CMC) is 17 10/26/2021 1:30 PM. continued from 9/21/2021 to at 18 19 20 IT IS SO ORDERED AS MODIFIED. 21 22 Septmber 10\_, 2021 Dated: 23 United States Magistrate Judge 24 25 26 27